



Oct. 8, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

**Re: Notice of *Ex Parte* presentation in: WC Docket No. 10-90;
 WC Docket 05-337;
 MB Docket 10-56**

Dear Secretary Dortch:

This is to inform you that on Wednesday, October 3, 2012, Larra Clark (American Library Association), Amina Fazlullah (Benton Foundation), Michael Spead (ICF International), Hilary Goldmann (International Society for Technology in Education), Don Means (Digital Village Associates - by phone) and the undersigned, on behalf of the Schools, Health and Libraries Broadband Coalition ("SHLB Coalition")¹ met with FCC Commissioner Rosenworcel and Priscilla Argeris to discuss the above-captioned items.

With regard to the Comcast-NBC Merger Order, the SHLB Coalition asked whether or not Comcast had submitted information to demonstrate that it is complying with the Merger Order condition to provide free video and high-speed Internet service to 200 community anchor institutions per year for three years.

With regard to the Connect America Fund, the SHLB Coalition pointed out that community anchor institutions (CAIs) provide essential services to their communities, such as distance learning, e-government services, assistance with employment applications and job training, medical information and monitoring, and other educational and health-related services.

¹ The SHLB Coalition includes a wide range of entities that share the goal of promoting affordable, open, high-capacity broadband to community anchor institutions. A full list of our members is available at www.shlb.org.

Community anchor institutions represent the “third leg of the stool” of a healthy community, along with residences and businesses. Anchor institutions, however, need much greater bandwidth than the 4 Mbps that the FCC proposed for residential users.

The SHLB Coalition proposed that the Commission should consider asking questions in the upcoming NPRM about three ways to improve the level of broadband service provided to anchor institutions in rural and high-cost areas. The SHLB Coalition suggested that these steps would help achieve the National Broadband Plan goal of providing anchor institutions in every community with affordable access to 1 Gbps bandwidth:

1. Recipients of CAF Phase I funding could be obligated, as a condition of receiving funding, to provide the CAIs in their regions with higher capacity bandwidth than 4 Mbps. This may mean that recipients of funding should be entitled to receive more funding for each of the CAIs they serve than the \$775 per location amount identified in the Order.
2. Recipients of CAF funding could be allowed to use the funding for the one-time costs of building high-capacity Second Mile/Middle Mile networks to each community with an open interconnection policy. Such an approach would reduce the backhaul costs of serving a community and would make it easier for commercial and/or non-commercial entities to provide high-capacity Last Mile services to the community’s anchor institutions and residences and businesses. Such an approach would also allow communities to “self-provide” their own Last Mile connections to community anchor institutions and the surrounding residential and business customers.

3. A certain portion of the remaining \$185 M could be set aside for the FCC to award via a “challenge grant” process. The FCC could invite commercial and non-commercial entities to submit applications for funding to serve all the anchor institutions in the community with a shared, high-capacity network. This plan would be consistent with the National Broadband Plan’s recommendation that aggregated demand over shared networks can be the most efficient way for communities to obtain high-capacity broadband service.

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." with a stylized, cursive script.

John Windhausen, Jr.

Director

Schools, Health and Libraries Broadband (SHLB) Coalition

jwindhausen@telepoly.com

(202) 256-9616